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11 *Attorneys for Plaintiff Dan Clarke*

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

DAN CLARKE,

Plaintiff,

vs.

PACIFIC GAS AND ELECTRIC COMPANY; and
PG&E CORPORATION

Defendants.

Case No. 14-cv-04393-WHO

**JOINT STIPULATION TO
CONTINUE DEFENDANTS'
MOTION TO DISMISS SECOND
AMENDED COMPLAINT, TO
STRIKE AND FOR SANCTIONS
AND EXTEND TIME TO FILE
OPPOSITION AND REPLY
THERETO; [PROPOSED] ORDER**

JOINT STIPULATION TO CONTINUE DEFENDANTS' MOTION TO DISMISS SECOND AMENDED
COMPLAINT, TO STRIKE AND FOR SANCTIONS AND EXTEND TIME TO FILE OPPOSITION AND
REPLY THERETO; [PROPOSED] ORDER; CASE NO. 14-cv-04393-WHO

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RECITALS

WHEREAS, on March 18, 2020, Clarke filed his Second Amended Complaint (“SAC”);

WHEREAS, on April 1, 2020, PG&E filed a Motion to Dismiss Clarke's SAC, to Strike

and For Sanctions (“Motion to Dismiss”), and set a hearing for May 7, 2020;

WHEREAS, pursuant to Local Rule 7-3, Clarke's opposition to the Motion to Dismiss

would be due on April 15, 2020, and PG&E's reply would be due on April 22, 2020; and

WHEREAS, the Parties agree to a two-week extension of Clarke's term.

WHEREAS, the undersigned counsel for Defendants has consented to the undersigned counsel for Plaintiff signing the instant stipulation on his behalf

NOW, THEREFORE, Pursuant to Civil Local Rule 6-1(b), the Parties stipulate and agree as follows, subject to the Court's approval:

STIPULATION

1. Clarke will file his Opposition to PG&E's Motion to Dismiss on or before April 29, 2020;

2. PG&E will file its Reply in support of Motion to Dismiss on or before May 13, 2020;

3. The May 7, 2020 hearing on PG&E's Motion to Dismiss is hereby continued to May 28, 2020 at 10:30 a.m., or the Court's next available date.

DATED: April 3, 2020

WFBM, LLP

By: /s/ Scott D. Mroz

SCOTT D. MROZ

ATTORNEYS FOR PACIFIC GAS AND
ELECTRIC COMPANY AND PG&E
CORPORATION

JOINT STIPULATION TO CONTINUE DEFENDANTS' MOTION TO DISMISS SECOND AMENDED COMPLAINT, TO STRIKE AND FOR SANCTIONS AND EXTEND TIME TO FILE OPPOSITION AND REPLY THERETO; [PROPOSED] ORDER; CASE NO. 14-cv-04393-WHO

1 DATED: April 3, 2020

GROSS & KLEIN LLP

2 By: /s/ Stuart G. Gross

3 STUART G. GROSS
4 ATTORNEYS FOR DAN CLARKE

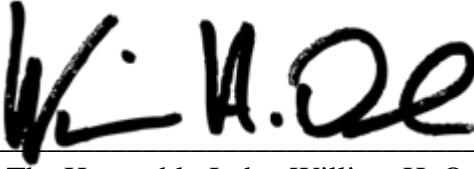
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7 **ORDER**

8 PURSUANT TO STIPULATION, as modified IT IS SO ORDERED. The hearing will be
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10 on May 27, 2020 at 2:00 p.m.

11 Dated: April 3, 2020

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The Honorable Judge William H. Orrick

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